Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Re Delete, Delete, Delete	)	GN Docket No. 25-133

COMMENTS OF OVZON LLC

Ovzon LLC
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April 11, 2025

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I. INTRODUCTION AND SUMMARY

Ovzon LLC {"Ovzon") is a US based company which provides mission critical satellite communications services to certain US Government customers.

Ovzon welcomes the opportunity to provide proposals in response to the Commission's timely proceeding regarding "Re: Delete, Delete, Delete" under GN Docket No. 25-133.

Ovzon has an interest in the current and future use and disposition of the band 12.75 – 13.25 GHz band which is allocated on a co-primary basis in the US to the FSS (earth-to-space) under various regulatory conditions. The frequency band 12.7 – 13.25 GHz is presently also the subject of an ongoing FCC proceeding – *In the Matter of Expanding the Use of the 12.7-13.25 GHz Band for Mobile Broadband or Other Expanded Use*, GN Docket 22-352, Notice of Inquiry, FCC 22-80 (Oct. 2022).

In that above referenced FCC proceeding pertaining to the 12.7 – 13.25 GHz frequency band, various satellite operators / satellite service providers (including Ovzon) have submitted jointly[1] and separately detailed comments proposing and requesting the FCC to permit expanded FSS use of the 12.75 – 13.25 GHz frequency band and to not authorize for various reasons the expanded use of this frequency band for future mobile broadband.

Ovzon proposes for the reasons given below that the Commission should take action to:

- Firstly, delete provision NG52 presently applicable in the frequency band 12.75 – 13.25 GHz;
- Secondly, delete the freeze on new or modified FSS earth station and space station license applications in the frequency band 12.75 – 13.25 GHz;
- Thirdly, delete the current burdensome regulatory barriers within the above band.

The removal of these regulatory barriers will enable expanded FSS use of this frequency band which will be of significant and immediate benefit to US Government and other consumers.

[1] See for example Joint Reply Comments of the Satellite Operators, GN Docket No. 22-352, (filed September. 8, 2023)

II. PROPOSALS

Ovzon believes that the Commission should enable the use of the frequency 12.75 – 13.25 GHz for expanded FSS services on a coordinated / shared basis with the relevant prior licensed co-primary Fixed Services whose use is governed by existing FCC regulations.

Ovzon believes that the Commission should permit such expanded FSS use by **deleting** some current FCC regulations which highly constrains and pose regulatory barriers. Such action will enable the current and future use of this 12.75 – 13.25 GHz band for a wide range of domestic and international broadband FSS services to the benefit of US consumers, enterprises, state and federal bodies. The satellite industry, via various GEO and Non-GEO satellite operators and their partner service providers, is immediately (i.e. already in 2025) able to offer via already existing operational and planned advanced satellite systems. These satellite systems are technically capable of providing a very wide range of valuable broadband FSS services to US Government and civilian customers.

Proposal 1:

In the US Table of Frequency Allocations (see 47 CFR § 2.106) provision NG52 states "*Except as provided for by paragraph (d)(527) of this section, use of the bands 10.7-11.7 GHz (space-to-Earth) and 12.75-13.25 GHz (Earth-to-space) by geostationary satellites in the fixed-satellite service (FSS) shall be limited to international systems, i.e., other than domestic systems."*

It is first specifically proposed that the Commission take early action to **delete NG52** and so remove the limitation of use by GEO systems to "international systems" and thereby permit "domestic systems" to use this band.

The deletion of NG52 would permit both domestic satellite systems and international satellite systems to provide an expanded range of FSS services in the US to the significant benefit of US consumers, enterprises, state and federal bodies from 2025 onwards.

Proposal 2:

It is secondly specifically proposed that the Commission take early action to **delete the current procedural freeze on new or modified FSS earth station and space station license applications in the 12.75 – 13.25 GHz frequency band**. This FCC enacted freeze was initially put in place on 19 September 2022 for a period of 180 days; the FCC then extended this freeze in the above referenced proceeding pertaining to the 12.7 – 13.25 GHz frequency band.

The existence of this freeze on new FSS earth station and space station applications prevents the expanded use by the FSS in the 12.75 – 13.25 GHz frequency band. This in turn precludes the wide range of benefits which can be provided immediately and in the near to medium future by current and planned GEO and Non-GEO Ku band FSS satellite systems. These satellite systems would provide expanded FSS services of significant benefit to US consumers, enterprises, state and federal bodies from 2025 onwards.

Proposal 3:

It is thirdly proposed that the Commission take action on deleting existing regulation which overly complicate the licensing of earth stations and space stations in this 12.75 – 13.25 GHz frequency band.

III. CONCLUSION

Ovzon welcomes the initiation of this proceeding by the Commission. Ovzon urges the Commission to take action to remove existing regulatory barriers by deleting the above indicated regulatory provisions. The early deletion of those regulatory provisions will permit expanded FSS use in the 12.75 – 13.25 GHz band which Ovzon believes is in the public interest.

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